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*Attorneys for Lead Plaintiff Richard Worley
and the Proposed Settlement Class*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

COURTNEY ELKIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALTER INVESTMENT MANAGEMENT
CORP., GEORGE M. AWAD, ANTHONY
N. RENZI, and GARY L. TILLET,

Defendants.

Case No.: 2:17-cv-02025-JCJ

**LEAD PLAINTIFF'S UNCONTESTED
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT AND
APPROVAL OF NOTICE TO THE
SETTLEMENT CLASS**

PLEASE TAKE NOTICE that Lead Plaintiff, Richard Worley, hereby moves this Court for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (i) preliminarily approving the proposed Settlement of the Action; (ii) certifying the Settlement Class, and appointing Lead Plaintiff as class representative and Lead Counsel Glancy Prongay & Murray LLP (“Lead Counsel”) as class counsel for the purposes of the Settlement; (iii) approving the form and manner of providing notice of the Settlement to the Settlement Class; (iv) setting a hearing at which the Court will consider final approval of the Settlement, approval of the plan of allocation, and Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses; and (v) such other and further relief as this Court deems just and proper.

Lead Plaintiff is contemporaneously herewith filing a memorandum of law and Declaration of Lee Albert, dated July 13, 2018, with annexed exhibits, in support of this motion. A proposed Order Preliminarily Approval Settlement And Providing For Notice Notice to the Settlement Class, which was negotiated by the parties to the Settlement, is also submitted herewith.

Pursuant to Local Rule 7.1(b), I certify that this motion is uncontested.

Dated: July 13, 2018

Respectfully submitted,

GLANCY PRONGAY & MURRAY LLP

By: /s/ Lee Albert
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*Lead Counsel for Lead Plaintiff and the Proposed
Settlement Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On July 13, 2018, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of Pennsylvania, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 13, 2018.

s/ Lee Albert
Lee Albert

Mailing Information for a Case 2:17-cv-02025-JCJ ELKIN v. WALTER INVESTMENT MANAGEMENT CORP. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

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- (No manual recipients)